

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JUSTIN RIDDLE,

Plaintiff,

v.

X CORP. formerly known as TWITTER, INC.,

Defendant.

Civil Action No. 1:25-cv-00073-ADA

**DECLARATION OF KENNETH M. TRUJILLO-JAMISON IN SUPPORT OF
DEFENDANT X CORP.'S MOTION TO STAY PENDING RULING BY THE SUPREME
COURT OF THE UNITED STATES ON A POTENTIALLY CONTROLLING LEGAL
ISSUE AND CORRESPONDING REQUEST FOR JUDICIAL NOTICE**

I, Kenneth M. Trujillo-Jamison, declare as follows:

1. I am an attorney at the law firm Willenken LLP, counsel of record for Defendant X Corp. in the above-captioned case.

2. I make this declaration in support of X Corp.'s Motion to Stay Pending Ruling by the Supreme Court of the United States on a Potentially Controlling Legal Issue ("Motion") and corresponding Request for Judicial Notice in Support of Its Motion.

3. **Exhibit 1** is a true and correct copy of the petition for a writ of certiorari filed in *Cox Communications v. Sony Music Entertainment*, No. 24-171, 2024 WL 3860067 (cert. granted June 30, 2025) ("*Cox Communications*"), available at https://www.supremecourt.gov/DocketPDF/24/24-171/322523/20240815090212089_240802a%20Petition%20for%20efiling.pdf (last visited July 31, 2025).

4. **Exhibit 2** is a true and correct copy of a true and correct copy of the Supreme Court of the United States Granted & Noted List October Term 2025 Cases for Argument, available at <https://www.supremecourt.gov/orders/25grantednotedlist.pdf> (last visited July 31,

2025).

5. **Exhibit 3** is a true and correct copy of the questions presented in *Cox Communications*, available at <https://www.supremecourt.gov/qp/24-00171qp.pdf> (last visited July 31, 2025).

6. **Exhibit 4** is a true and correct copy of the Petition for A Writ of Certiorari filed in *Grande Communications Networks, LLC v. UMG Recordings, Inc.*, No. 24-967, (petition for cert. filed March 6, 2025) (“*Grande Communications Networks*”), available at https://www.supremecourt.gov/DocketPDF/24/24-967/351431/20250306224742086_grande%20v.%20umg%20--%20cert.%20petition%20--%20FILED.pdf (last visited July 31, 2025).

7. **Exhibit 5** is a true and correct copy of the docket related to the petition for a writ of certiorari filed in *Grande Communications Networks*, available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/24-967.html> (last visited July 31, 2025).

8. **Exhibit 6** is a true and correct copy of an email that Plaintiff sent to Norma N. Bennett, also counsel for X Corp. in the above-captioned case, and me on July 12, 2025.

9. X Corp. met and conferred with Plaintiff regarding this Motion. On August 8, 2025, Plaintiff informed X Corp.’s counsel that he intends to oppose the instant motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 8, 2025

/s/ Kenneth M. Trujillo-Jamison
Kenneth M. Trujillo-Jamison